

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT WESTERN DIVISION OF OHIO

ALBERT PETTIES, II	)
	)
Plaintiff	)
	)
	)
v	)
	)
GENERAL MOTORS, LLC	)
	)
Defendant	)

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COMPLAINT AND JURY DEMAND

Plaintiff, Albert Petties, II, represented by his attorney, Michelle E. Vocht, complains:

1. This lawsuit challenges race discrimination toward Plaintiff Albert Petties, II as a result of Defendant's wrongful termination of Mr. Petties based on false, and derogatory statements. the statements were made by a coterie of White employees who he supervised at General Motors, LLC.'s GM Powertrain & Fabrications Plant located at 1455 West Alexis Road, Toledo, OH 43612. There was never a claim that Mr. Petties made any racial remark or treated anyone differently because of race.
2. There was an underlying atmosphere of violent racial hate and racial

bullying at the GM Powertrain & Fabrications plant where African-American employees were subject to vilification and racially hostile remarks and epithets, including but not limited to the following;

- i) Multiple lynching nooses hanged above work stations;
- ii) White employees calling African-American employees “Boy”;
- iii) Swastikas painted and scratched on restroom stalls;
- iv) Stick figures drawn or scratched on bathroom stalls with nooses around their necks;
- v) Drawings and scratching of pistols and guns on the bathroom stalls;
- vi) Magazines such as “*Guns and Ammo*” touting the use of guns put on machines and in the break room;
- vii) Caucasian employees publicly stating that they are carrying guns in their cars and trucks parked on GM property;
- viii) Caucasians wearing shirts underneath their coveralls with visible Nazi symbols on them;
- ix) Calling African-American employees “monkey” and “mooley”;
- x). African-American employees being warned “to be careful” because a white employee’s “daddy was in the Ku Klux Klan”;
- xi). African-American employees being told to go back to Africa where

they belong;

xii) “Whites Only” signs hung on bathroom stall doors and written on walls outside the Men’s Room and locker room;

xiii) A White supervisor announcing, during a supposed team meeting about racial tolerance, “[W]hat’s the big deal about nooses, there was never a Black person who was lynched that didn’t deserve it.” That White supervisor was not disciplined;

xiv) White employees calling African-American employees “DAN”, which is acronym for “Dumb Ass N\*\*\*\*\*;

xv) A White employee intimidating an African-American employee by yelling in his ear in the breakroom, “Hey you be in my chair”, and pulling on the back side of the chair practically knocking the African-American over backwards;

xvi) “Blacks suck”, and “N\*\*\*\*\*s not allowed” scratched or written on the bathroom walls;

xvii) An African-American being told to “watch his back when driving;”

xviii) Writing on a White female’s property “N\*\*\*\*\* Lover” because she happened to be seen walking with an African-American in the plant;

xix) A White person advising an African-American to get a gun to defend himself;

xx) Refusing to listen and to work for African-American team leaders, including causing the assembly line to shut down;

xxi) Making threats of great bodily harm to beat an African-American supervisor with a shovel and a clutch, and to shoot him with a gun;

xxii) Making fun of the NAACP by cartoon characterization;

xxiii) Carving Ku Klux Klan pinnacle stars, and the words, “Whites Rule” and “Nagoar” and N\*\*\*\*\* on wood or other surfaces in the restrooms and locker rooms;

xxiv) Leaving bananas on African-American supervisor worker stations;

xxv) Instructing a supervisor to refrain from giving directions to White employees he supervised and directing him to give directions only to African-American employees;

xxvi) Confederate flags affixed to work equipment;

xxvii) Inflammatory racist threats, even naming, African American employees who attempted to tell the story and complained about the hotbed of insidious plant racism, with injury by lynching.

3. Throughout 2019, these racist activities were widely published locally, nationally and internationally on television programs, the internet and in newspapers.

4. Nonetheless, despite a belated and benign so-called “investigation” by GM and in the face of African-American employees identifying Caucasian culprits, no Caucasian was ever fired for any of the racist activities, as described above.

5. Into that milieu came Mr. Petties, a talented African American engineer, who had a productive and sterling career at GM at other facilities before his August 2019 assignment to that GM plant.

6. Indeed, Mr. Petties attended and received a Bachelor of Science and Masters Degree from Kettering University (formerly known as the General Motors Institute), a school created and sponsored by GM, to groom potential executive employees.

7. Mr. Petties’ experience at GM was as follows:

2005 - 2009

Spring Hill, Tennessee

General Assembly Electrical Engineer

Jan 2012-Dec. 2012

Pontiac, Michigan

Group Lead Powertrain Pre-Production Operations

Jan 2013-Jan 2014

Tonawanda, NY

Gen V Project Controls Engineer

2014-2015

Spring Hill, Tennessee

Controls Engineer on the CIUX Injection Molding Project

2015-2017

Pontiac, Michigan

FMS / Heads Crankshafts Group Leader at  
Global Propulsion Systems PPO

2017-2019

Baltimore, Maryland

Crew Lead for E-Motors and GRE Assembly

May 2019-Feb 21, 2020

Toledo, Ohio

Team Lead Rear Wheel Drive Assembly

8. On February 21, 2020, Mr. Petties was wrongfully fired by GM, and ultimately replaced by a White employee.

COUNT III  
WRONGFUL TERMINATION  
VIOLATION OF 42 U.S.C. § 1981

9. Plaintiff incorporates the Common Allegations as though fully set forth herein.

10. GM treated Plaintiff differently than White people on account of his race and employed disparate discipline on him because, within a racially hostile work environment, a coterie of White people, he supervised, decided he was too tough on them.

11. Plaintiff's termination occurred in the face of abject failures to take measures to prevent and remedy the racist activities of employees in the same facility.

12. As a result of Defendant GM's wrongful conduct toward Mr. Petties, he has lost wages and benefits, and the trajectory of his career was destroyed as if he did not matter.

13. GM's misconduct subjected and continues to subject Mr. Petties to emotional and psychological injuries, as a victim of race discrimination, that will never be cured.

14. GM engaged in racially discriminatory practices toward Mr. Petties with malice or reckless indifference to his protected rights, and he is entitled to an award of punitive damages pursuant to 42 U.S.C. § 1981(a).

#### REQUEST FOR RELIEF

Plaintiff, Albert Petties, II, asks a judgment to fully compensate him for the harm he has suffered, as well as punitive damages, costs and attorney fees so wrongfully sustained.

ROY, SHECTER & VOCHT, P.C.  
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Dated: March 23, 2021

JURY DEMAND

Plaintiff requests a trial by jury as to those claims so triable.

ROY, SHECTER & VOCHT, P.C.

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Dated: March 23, 2021